

unopposed motion and the accompanying brief in support regarding the Rule 11 safeharbor adjustment. Exhibit A is a true and correct copy of the email.

6. I did not receive a response to my email.

I declare under penalty of perjury that the foregoing is true and correct.

5/19/23
Date

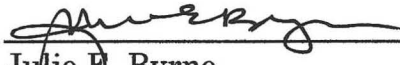

Julie E. Byrne

EXHIBIT A



Julie Byrne <jebyrne@ashbrookbk.com>

Proposed Unopposed Motion

1 message

Julie Byrne <jebyrne@ashbrookbk.com>

Thu, Feb 23, 2023 at 9:10 PM

To: Lynnette Dinkler <lynnette@dinkler-law.com>, JP@johnpodgurski.com, David Carey <dcarey@acluohio.org>, mpicasso@aclu.org, rsaxe@aclu.org, afruitwala@aclu.org, mmeuti@beneschlaw.com, dhopkins@beneschlaw.com, Freda Levenson <flevenson@acluohio.org>

Cc: Nicholas Barry <nicholas.barry@aflegal.org>, Joseph Ashbrook <jpashbrook@ashbrookbk.com>

Counsel:

We would like to file the attached unopposed motion. The highlighted language would only be included if the motion is opposed. If opposed, then we would remove the "unopposed" notation in the captions.

We plan to file at 2 PM EST tomorrow. If we don't hear from you by then, we will assume that you are opposing the motion.

Thank you,
Julie

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Julie E. Byrne

Attorney-at-Law

jebyrne@ashbrookbk.com

513.827.1776



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2 attachments



ABK - Motion for Rule 11 Safe Harbor Adjustment - Proposed.pdf
80K

 **ABK - Brief for Rule 11 Safe Harbor Motion - Proposed.pdf**
118K